

## Privacy Policy

Heritage Health Solutions, Inc. ("Heritage") is committed to complying with all laws that protect the privacy of your information, and such laws will prevail over any conflicting provisions of this Privacy Policy. In this Privacy Policy, references to expressions such as "us" and "we" are be deemed to be references to Heritage, its subsidiaries and affiliates.

Heritage provides users with access to [www.heritagehealthsolutions.com](http://www.heritagehealthsolutions.com) (the "Website"), which is associated with Heritage's products and services. In order to provide you this information and access to the Website, enhance your overall service experience, and for other reasons set forth below, Heritage may share in certain cases, with certain of its affiliates all or portions of the customer information gathered through your use of this Website as described below.

Heritage is committed to complying with all laws that protect the privacy of user information and have created this Privacy Policy to demonstrate our firm commitment to individual privacy. This Privacy Policy informs you about how we look after your personal data and provides information about your privacy rights and how the law protects you. It aims to give you information on how Heritage collects and processes your personal data through your use of this Website, including any data you may provide to us through Website. We can be contacted regarding this privacy policy at [communications@heritagehealthsolutions.com](mailto:communications@heritagehealthsolutions.com). We are the data controller responsible for your personal data.

It is important that you read this Privacy Policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. We keep our Privacy Policy under regular review and so it is important that you check the Privacy Policy from time to time in order to read any amendments which we have made. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Note, any applicable privacy laws will prevail over any conflicting provisions of this Privacy Policy.

Our information-gathering and dissemination practices for this Website are set forth below:

### Collecting Personal Data

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). The personal data we collect may include identity data, contact data, usage data, technical data, and marketing data as described below.

**Information That You Give Us:** Heritage collects and stores any information provided by the user that is collected directly from our site's Customer Service On-line Request form. Such information includes personal data, such as identity data (First Name, Last

Name, [any other – DOB, gender, marital status, title, maiden name?]) and contact data (a valid email address, Telephone Number, [any other?]). You decide how much information is shared with us in most cases.

**Information Collected Automatically:** Heritage also collects and stores information generated by user's website activity, like usage data and other technical data automatically collected from user's browser or mobile device. The technical data may include your IP address, browser type, language, location, operating system, time zone setting, browser plug-in types and versions, and platform and other technology on devices you use to access the Website. Usage data we collect may include Uniform Resource Locator (URL) clickstream to, through, and from our site (including dates, times, pages viewed), the amount of time of Website visits along with the number of times visited. We may assign you one or more unique identifiers to help keep track of user's future visits. In most cases, this information is generated by various tracking technologies including "cookies".

**Information from Other Sources:** If Heritage receive any information about a user from other sources (*i.e.*, Subscriber e-mail lists), we may add it to the information we already have about the user.

Heritage does not sell, trade, or share user information to any outside companies except in following cases:

**Advertising, Measurement and Analytics Services (Non-Personally Identifiable Information Only):** Heritage uses all the information we have about users to show relevant advertisements. We do not share personal data that personally identifies users with advertising measurement or analytics partners unless the user grants permission. Accordingly, we may collect marketing data including your preferences in receiving marketing communications from us and third parties and your preferences for sharing or not sharing personal data that personally identifies you. We may provide these partners with information about the reach and effectiveness of their advertising without providing information that personally identifies the user (*i.e.*, non-personal demographic information).

### **Cookies and Other Similar Technologies**

Our website uses "cookies" and "web beacon" technology. We use cookies and web beacons to distinguish you from other visitors, track your IP address and usage of our site, and to identify the name of the website from which you linked to our website. This information is used for fulfilling contracts with our business partners, and to help us serve you better by improving our website design, as well as our products, services and promotions. We do not otherwise track any information about your use of other websites. Non-personal data or anonymised/pseudonymised information obtained through cookies and web beacons may be shared with or obtained by service providers on our behalf.

A cookie is a small data file that is placed on the hard drive of your computer when you visit a website. A "session cookie" expires immediately when you end your session (*i.e.*, close your browser). A "persistent cookie" stores information on the hard drive so when

you end your session and return to the same website at a later date, the cookie information is still available. A web beacon is a small string of code that represents a clear graphic image and is used in conjunction with a cookie.

When you visit our website, we may use both a session and a persistent cookie. This Heritage-placed cookie may contain information (such as a unique user ID) that is used to track your usage of our website and in some cases, your email address. Your email address is only saved in this Heritage-placed cookie if you register with us. The web beacon allows us to capture certain additional types of information about a visitor's actions on our website, such as a visitor's cookie number, the time, date, duration and number of page views, a description of the page where the web beacon is placed, and the details about any items that were purchased.

If you register with us, this Heritage-placed cookie allows us to recognise you when you return to our website and provides you with access to your account information. We may also use cookies to monitor and maintain information about your use of our website. If you have not saved your information with or ordered from us, we may monitor and maintain information about your use of our website in a manner that does not identify you.

We may use Flash Cookies (also known as Local Stored Objects) or other similar technologies. A Flash cookie is a small data file placed in a computer using Adobe Flash technology that may be built into your computer or downloaded by you to your computer. We use these technologies to personalise and enhance your online experience, facilitate processes, personalise and store your settings. Flash cookies may help our website visitors to, for example, set volume preference associated with a video experience. They help us improve our sites by measuring which areas are of greatest interest to customers. We do not use Flash cookies for marketing or behavioural targeting purposes. Flash cookies are different from browser cookies and the cookie management tools provided by your browser will not remove Flash cookies. If you disable Flash cookies or other similar technologies, please be aware that you may not have access to certain features and services that make your online experience more efficient and enjoyable.

You can disable cookies at any time by using your browser options; however, if you turn off cookies, we will not be able to track your purchases or enable you to make a purchase from our Website. In addition, we will not be able to recognise you as a registered user to allow you access to your account information.

**For Legal Reasons:** Heritage reserve the right to disclose any information collected through the Website pursuant to a court order subpoena issued by a court with proper jurisdiction. We reserve the right to transfer this information in the event of a sale or purchase of our company or transfer of its assets for any reason.

## **Use of Personal Data**

Heritage uses personal data to:

- Help diagnose problems with our server and to maintain our website;

- Provide the user the products and services for which the user have contracted and/or the information that the user have requested;
- Identify and analyze usage trends;
- Enable a personalized website experience;
- Provide in-depth information about related industry trends, current or new services, etc. via email;
- Comply with legal obligations.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us as described below.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **Keep Your Information Secure**

**Children Under the Age of 13:** Heritage's website is not intended for children 13 years of age. We do not knowingly collect personal data from children under 13. If user are under 13 years of age, please do not provide any information to this website. If we learn we have collected or received personal data from a child under 13, we will delete that data.

**Hypertext Transfer Protocol:** Heritage's website has a secure connection, HTTPS. The transmission of data is secured using a Secure Socket Layer (SSL), also known as a security certificate.

## **Failure to Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that personal data when requested, we may not be able to perform the service we are, or are trying to, provide to you. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

## **Mailing Policy**

If user sends Heritage an email, we use the email address to thank the user for their comment and/or reply to the user's request. We will store the request communication and reply for any future correspondence.

## **Data Retention**

When information or other services requested, Heritage uses the email address and any other information given, until user opts out by using the 'unsubscribe' instructions provided with each email. Personal information collected in other ways (i.e. browser tracking) will be stored for up to 180 days. Users can opt-out by following the instructions for Dispute Resolutions listed below.

## **Dispute Resolutions**

For any complaints regarding Heritage's compliance with this privacy policy, first contact us at [communications@heritagehealthsolutions.com](mailto:communications@heritagehealthsolutions.com). We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal data in accordance with this privacy policy. Please allow 5-10 business to response.

## **Links**

The Website may contain links to other sites. We are not responsible for the privacy practices or content of such Websites. Heritage advises you to carefully read the privacy policy of every website that you visit to determine how they will handle any personal data they collect from you, given that these rules can differ from our privacy policy.

## **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected or actual personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Retention Of Your Personal Data**

We will only retain your personal data for as long as it is necessary to provide our services or to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## **Your Rights**

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your data unlawfully or where we are required to erase your personal data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your data which override your rights and freedoms;

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it; and

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise any of the rights as listed above, please contact us at [communications@heritagehealthsolutions.com](mailto:communications@heritagehealthsolutions.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or if additional copies of your personal data are requested. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific data from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Change/Modify**

Heritage may, in our sole discretion and without notice, change, modify or relocate this Privacy Policy. It is your responsibility to periodically review this Privacy Policy for changes.

### **Contact Information**

For any questions about this privacy policy, you can Heritage Health Solutions via [communications@heritagehealthsolutions.com](mailto:communications@heritagehealthsolutions.com) or U.S. Postal mail at Heritage Health Solutions, ATTN: Website Privacy Policy Officer, 750 Canyon Rd, Suite 120, Coppel, TX, USA 75019.